

FILED

APR 30 2020

U.S. DISTRICT COURT-WVNC  
MARTINSBURG, WV 25401

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

ELIZABETH JO SHIRLEY,  
Defendant.

Criminal No. 3:20-cr-21

Violations:

18 U.S.C. § 793(e)  
18 U.S.C. § 1204

INFORMATION

The United States Attorney charges that:

COUNT ONE

(Willful Retention of National Defense Information)

From in or about 1999, up to and including on or about August 18, 2019, in the Northern District of West Virginia, and elsewhere, the defendant, **ELIZABETH JO SHIRLEY**, having unauthorized possession of, access to, and control over documents relating to the national defense, did willfully retain the documents and failed to deliver them to the officer or employee of the United States entitled to receive them, to wit, the defendant without authorization retained in a storage unit leased by the defendant a document classified at the TOP SECRET/SCI level from the National Security Agency (NSA) relating to the national defense that outlines intelligence information regarding a foreign government's military and political issues.

In violation of Title 18, United States Code, Section 793(e).

**COUNT TWO**

(International Parental Kidnapping)

From on or about July 19, 2019, and up to and including on or about August 13, 2019, in the Northern District of West Virginia, and elsewhere, the defendant, **ELIZABETH JO SHIRLEY**, did remove a child, to wit, her daughter, from the United States and retain the child outside of the United States with the intent to obstruct the lawful exercise of another person's parental rights.

In violation of Title 18, United States Code, Section 1204.



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WILLIAM J. POWELL  
United States Attorney

Jarod J. Douglas  
Assistant United States Attorney